

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of

Amendments to the amateur  
service rules regarding  
volunteer examiner session  
manager.

WT 95-57

COMMENTS

Filed 2 July 1995

By: Wilton Helm, WT6C, an accredited examiner with ARRL/VEC

The purpose of the proposed rule change is not completely clear to me, but I will address two possible reasons that a change might be desired:

- 1) To define a chain of command, providing a single point of leadership for a VE team.
- 2) To allow multiple teams to function more effectively within a single testing session.

The first reason cited above does not seem to me to warrant a change in the existing program. While each VEC is free to require whatever structure they feel necessary upon their teams in order to fulfill their responsibilities (such as the ARRL liaison position, which I have filled at our sessions for several years), it does not seem to me that the FCC needs to be involved in this level of micro-management in order to have an effective test program in place. Specifically, I oppose any change in the rule that places more legal burden on a single person in the team. The present process requires all team members to be aware of and accountable for any actions taken, and this is as it should be.

The second reason may have merit. I have had several occasions to lead test session where the number of applicants was sufficiently large that three examiners could not review all exams in a reasonable length of time. The solution which we have used effectively was to create two teams, and make certain that each applicant's papers are all handled by the same team. Other groups have followed the procedure of issuing CSCE's for individual elements to avoid having to track applicants through the system, or to allow examiners to specialize (i.e. do only code). While both of these methods work, each adds to the overhead of the session. If a procedure could be devised whereby any three of the on site applicants could grade any paper, and any three who had graded one or more papers for the applicant in

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question (typically the last three) could sign the 610 and CSCE it would simplify the process.

A session manager would be one way of implementing this strategy, as he/she would have the final say on who signed what. Other possibilities could be used equally well however. One that comes to mind is for each exam to have a place for three signatures (currently we have each examiner initial the exam, indicating agreement with the result written on it). In addition there would need to be a session report form signed by all VE's who graded papers at that session. This would allow any combination of three examiners to grade any paper, while still providing a trail of accountability.

This would also aid in one other weak area in test sessions. Currently the three examiners whose signature appears on the 610 and CSCE are required to observe any irregularities in the session, such as sharing answers or having constants stored in calculators. The pressure of grading a stack of papers, which implies looking down, not out, often limits the effectiveness of this. While this has not been a major problem at our sessions, I did have one candidate who took two different versions of an exam and got such different results that I later wondered if she had been adequately supervised the second time. The procedure I have outlined above could allow, at larger sessions, extra VE's who are not grading tests to supervise the room full time, looking for inappropriate conduct. They, like the ones grading would sign the session report, thereby being part of the team responsible for the results of the session.

Notice that this recommendation does not place responsibility on one person, but actually spreads it over a larger group. This shared responsibility model is the norm for commercial business practices (especially in the vulnerable area of accounting) where it has proven itself. It has also been the backbone of amateur volunteer exams, where it has proven itself well. The team does a good job of checking up on each other and avoiding shortcuts or irregularities when each realized that they are jointly and severally liable for the consequences--that their own license is at stake.

Respectfully,

*William Helms*